

Alan Alexander Beck
Law Office of Alan Beck
2692 Harcourt Drive
San Diego, CA 92123
(619) 905-9105
Hawaii Bar No. 9145
Alan.alexander.beck@gmail.com

Stephen D. Stamboulieh
Stamboulieh Law, PLLC
P.O. Box 4008
Madison, MS 39130
(601) 852-3440
stephen@sdslaw.us
MS Bar No. 102784
*Admitted Pro Hac Vice

Attorneys for Plaintiffs
TODD YUKUTAKE and DAVID KIKUKAWA

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII**

TODD YUKUTAKE and DAVID)
KIKUKAWA)
)
Plaintiffs,)
) Civil Action No. 19-578 (JMS-RT)
v.)
)
CLARE E. CONNORS, in her) DECLARATION OF STEPHEN D.
Official Capacity as the Attorney) STAMBOULIEH; EXHIBITS "1" – "6"
General of the State of Hawaii)
and the CITY and COUNTY)
OF HONOLULU) TRIAL: January 12, 2021 9AM
) JUDGE: Hon. J. Michael Seabright
) HEARING: October 19, 2020 10AM
Defendants.)
)

DECLARATION OF STEPHEN D. STAMBOULIEH

I, Stephen D. Stamboulieh, declare as follows:

1. I am an attorney with the law firm of Stamboulieh Law, PLLC, counsel for Plaintiffs in the above-captioned action. I am admitted *pro hac vice* in this matter.

2. I am authorized and competent to testify to the matters contained in this declaration, and unless otherwise indicated, I make this declaration based upon personal knowledge.

3. I am an attorney licensed to practice in all state and federal courts in Mississippi; the Northern District of Texas; Southern District of Texas; Washington, D.C. District Court; Second, Third, Fourth, Fifth, Sixth, Ninth & District of Columbia Circuit Courts of Appeals; United States Court of Federal Claims; Northern District of New York; and the United States Supreme Court. I am a member in good standing of all the aforementioned courts.

4. Attached hereto as Exhibit “1” is a true and accurate copy of selected portions of the City and County of Honolulu’s Response to Plaintiffs’ First Set of Request for Admissions.

5. Attached hereto as Exhibit “2” is a true and accurate copy of selected portions of the City and County of Honolulu’s Response to Plaintiffs’ First Set of Interrogatories.

6. Attached hereto as Exhibit “3” is a true and accurate copy of selected portions of Act 275 (1988).

7. Attached hereto as Exhibit “4” is a true and accurate copy of Act 178 (1984).

8. Attached hereto as Exhibit “5” is a true and accurate copy of selected portion of House Journal Standing Committee Reports, SCRep. 464-88.

9. Attached hereto as Exhibit “6” is a true and accurate copy The State of Hawaii Permit to Acquire Firearms Application, Application for Permit to Acquire, Medical Information Waiver, and Firearms Information Form.

10. Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Dated: Canton, Mississippi, September 28, 2020.

Respectfully submitted,

Counsel for Plaintiffs

/s/ Stephen D. Stamboulieh

Stephen D. Stamboulieh

Stamboulieh Law, PLLC

**Admitted Pro Hac Vice*